

Rory T. Kay (NSBN 12416)  
 John A. Fortin (NSBN 15221)  
 Tara U. Teegarden (NSBN 15344)  
 McDONALD CARANO LLP  
 2300 West Sahara Avenue, Suite 1200  
 Las Vegas, Nevada 89102  
 Telephone: (702) 873-4100  
 rkay@mcdonaldcarano.com  
 jfortin@mcdonaldcarano.com  
 tteegarden@mcdonaldcarano.com

*Attorneys for Defendant TMIF II Portola, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA  
 ex rel. PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiffs,

vs.

PORTOLA DEL SOL OPERATOR, LLC,  
 14 a foreign limited-liability company;  
 TMIF II PORTOLA, LLC, a foreign limited-  
 15 liability company; APARTMENT  
 MANAGEMENT CONSULTANTS, LLC,  
 16 a foreign limited liability company, and  
 RENE RICHARDSON, as AGENT of  
 17 PORTOLA DEL SOL OPERATOR, LLC.,

Defendants.

Case No.: 2:21-cv-01123-APG-BNW

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR TMIF  
 PORTOLA, LLC TO FILE RESPONSIVE  
 PLEADING TO COMPLAINT**

**[First Request]**

Under Local Rules IA 6-1 and 7-1, Defendant TMIF II Portola, LLC (“TMIF”) and Plaintiff Peggy Thornton (“Thornton”), by and through their attorneys, hereby stipulate and request that the Court extend the deadline for TMIF to file its responsive pleading to Thornton’s Complaint (“Complaint”) from March 10, 2023, up to and including March 24, 2023.

In support of this Stipulation, the parties state as follows:

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**McDONALD CARANO**

2300 WEST SAHARA AVENUE, SUITE 1200 • LAS VEGAS, NEVADA 89102  
PHONE 702.873.4100 • FAX 702.873.9966

1. On June 14, 2021, Thornton filed this action under seal in the United States District Court for the District of Nevada, asserting a single claim for alleged violations of the False Claims Act. (ECF No. 1).

2. On February 17, 2023, Thornton served TMIF with a copy of the Complaint.

3. The parties thereafter agreed to extend the deadline for TMIF to respond to Thornton's Complaint from March 10, 2023 to March 24, 2023.

4. TMIF retained McDonald Carano LLP as counsel for this matter. TMIF's counsel needs additional time to investigate and prepare an appropriate response to Thornton's Complaint.

5. This is TMIF's first request to this Court for an extension of time to respond to Thornton's Complaint, the request is in good faith and not for the purposes of delay, and the requested extension will not prejudice any party.

6. The parties stipulate and request that the Court extend the deadline for TMIF to respond to Thornton's Complaint from March 10, 2023, up to and including March 24, 2023.

DATED this 7th day of March, 2023.

NEVADA LEGAL SERVICES, INC.

McDONALD CARANO LLP

By: /s/ Elizabeth S. Carmona  
Elizabeth S. Carmona (NSBN 14687)  
530 S. 6th St.  
Las Vegas, Nevada 89101

By: /s/ Tara U. Teegarden  
Rory T. Kay (NSBN 12416)  
John A. Fortin (NSBN 15221)  
Tara U. Teegarden (NSBN 15344)  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102

*Attorneys for Plaintiffs*

*Attorneys for Defendant TMIF II Portola, LLC*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: March 8, 2023